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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:

SHORES PROPERTIES, L.P.,

Debtor.

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CASE NO. 10-34904-sgj11
CHAPTER 11

Preliminary Hearing Date:
September 30, 2010
Preliminary Hearing Time:
1:30 p.m.

RESPONSE TO MOTION OF HILLCREST BANK FOR RELIEF FROM THE
AUTOMATIC STAY

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW Shores Properties, L.P., Debtor, in the above styled and numbered bankruptcy proceeding and files this its response to Hillcrest Bank, for Relief From the Automatic Stay (the "Motion") and would respectfully show the Court as follows:

SPECIFIC ADMISSIONS

1. Debtor admits the allegations contained in paragraph 1 of the Motion.
2. Debtor admits the allegations contained in paragraph 2 of the Motion.
3. Debtor admits the allegations contained in paragraph 3 of the Motion to the extent the documents speak for themselves.
4. Debtor admits the allegations contained in paragraph 4 of the Motion to the extent the documents speak for themselves.

5. Debtor admits the allegations contained in paragraph 5 of the Motion.
6. Debtor admits the allegations contained in paragraph 6 of the Motion.

SPECIFIC DENIALS

7. Debtor denies the allegations contained in paragraph 7 of the Motion.
8. Debtor denies the allegations contained in paragraph 8 of the Motion.
9. Debtor denies the allegations contained in paragraph 9 of the Motion.
10. Debtor denies the allegations contained in paragraph 10 of the Motion.
11. Debtor denies the allegations contained in paragraph 11 of the Motion.
12. Debtor denies the allegations contained in paragraph 12 of the Motion.
13. Debtor denies the allegations contained in paragraph 13 of the Motion.
14. Debtor denies the allegations contained in paragraph 14 of the Motion.

STATEMENT OF ADEQUATE PROTECTION

1. Lender is adequately protected by the value of the property.
2. The property is necessary for a reorganization.
3. Debtor intends to propose a plan in this case.
4. Debtor has equity in the property.

WHEREFORE, PREMISES CONSIDERED, Debtor prays the Court deny the Motion and relief requested and grant the Debtor such other and further relief to which it they may show itself entitled.

Dated: September 13, 2010

Respectfully Submitted,
/s/ Joyce W. Lindauer
Joyce W. Lindauer
State Bar No. 21555700
Attorney at Law

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Attorney for Debtor

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 13, 2010 a true and correct copy of the foregoing document was forwarded via electronic filing to those persons receiving electronic notice or First Class US Mail to the following:

Brian C. Mitchell
Bracewell & Guiliani, LLP
1445 Ross Avenue, Suite 3800
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Attached Mailing Matrix

/s/ Joyce W. Lindauer
Joyce W. Lindauer